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3 SKANE MILLS LLP  
4 1120 Town Center Drive, Suite 200  
5 Las Vegas, Nevada 89144  
6 (702) 363-2535 / Fax (702) 363-2534

7 Attorneys for Plaintiff, BRIGHTHOUSE LIFE INSURANCE COMPANY, AND  
8 BRIGHTHOUSE SECURITIES, LLC

9  
10  
11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**  
13

14 BRIGHTHOUSE LIFE INSURANCE  
15 COMPANY; and BRIGHTHOUSE  
16 SECURITIES, LLC,

17 Plaintiffs,

18 v.

19 GEORGE SCHMIDT, JR.; and  
20 LINCOLN FINANCIAL ADVISORS  
21 CORPORATION,

22 Defendants.

CASE NO.: 2:21-cv-01078-JCM-VCF

23 **STIPULATION AND ORDER FOR**  
24 **EXTENSION OF TIME FOR**  
25 **PLAINTIFFS TO RESPONSE TO**  
26 **DEFENDANT LINCOLN**  
27 **FINANCIAL ADVISORS**  
28 **CORPORATION'S MOTION TO**  
**DISMISS**

(Second Request)

29 COMES NOW, the parties, by and through their undersigned counsel,  
30 hereby stipulate and agree that the deadline for Plaintiffs, Brighthouse Life  
31 Insurance Company and Brighthouse securities, LLC ("Plaintiffs") to respond to  
32 Defendant Lincoln Financial Advisors Corporation's Motion to Dismiss [Doc. 20]  
33 shall be extended to and including January 28, 2022. This is an additional  
34 extension from the first request for an extension through January 14, 2022  
35 submitted by the parties [Doc. 23] and is requested due to COVID-19 illnesses on

1 the part of Plaintiffs' national counsel and difficulties coordinating with company  
2 representatives during the holidays.

3  
4 DATED: January 6, 2022

DATED: January 6, 2022

5  
6 SKANE MILLS LLP

McDONALD CARANO LLP

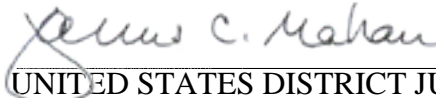
7 /s/ Sarai L. Thornton

/s/ Jeff Silvestri

8  
9 Sarai L. Thornton, Esq. (#11067)  
10 1120 Town Center Drive  
11 Suite 200  
12 Las Vegas, Nevada 89144

Jeff Silvestri, Esq. (#5779)  
Tara U. Teegarden, Esq. (#15344)  
2300 W. Sahara Avenue  
Suite 1200  
Las Vegas, Nevada 89102

13  
14 **IT IS SO ORDERED.**

15  
16   
17 UNITED STATES DISTRICT JUDGE

18 DATED: January 7, 2022  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## Yesenia Lutes

---

**From:** Jeff Silvestri <jsilvestri@Mcdonaldcarano.com>  
**Sent:** Thursday, January 6, 2022 11:24 AM  
**To:** Yesenia Lutes  
**Cc:** Jeff Silvestri; CaraMia Gerard  
**Subject:** RE: [External Sender] Collins - LFA Motion to Dismiss

Yes. You can sign for me

**Jeff Silvestri** | Partner

**McDONALD CARANO**

D: 702.257.4521 | C: 702.338.6387  
E: jsilvestri@mcdonaldcarano.com

**From:** Yesenia Lutes <YLutes@SkaneMills.com>  
**Sent:** Thursday, January 6, 2022 11:15 AM  
**To:** Jeff Silvestri <jsilvestri@Mcdonaldcarano.com>  
**Subject:** FW: [External Sender] Collins - LFA Motion to Dismiss

Mr. Silvestri:

Per Ms. Creed's email below, would you please confirm if we have your authorization to insert your e-signature to the attached stipulation?

Thank you.



Yesenia Lopez-Lutes, Paralegal  
1120 Town Center Drive, Suite 200, Las Vegas, Nevada 89144  
p: 702-363-2535 ext. 505  
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LOS ANGELES \* SAN DIEGO \* SAN FRANCISCO \* LAS VEGAS

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On Jan 6, 2022, at 11:47 AM, Aimee Creed <[acreed@dacambal.com](mailto:acreed@dacambal.com)> wrote:

Hi Paula and Jeff –

Please see attached and let me know whether we may affix your electronic signature before filing.

Thank you again,

Aimee

**Aimee L. Creed, Esq.**

d'Arcambal, Ousley & Cuyler Burk LLP

Direct dial: (212) 971-3175, ext. 104

Office: (212) 971-3175

Fax: 212-971-3176

**From:** Aimee Creed <[acreed@dacambal.com](mailto:acreed@dacambal.com)>

**Sent:** Wednesday, January 5, 2022 10:12 AM

**To:** Shaffner, Paula <[PShaffner@STRADLEY.COM](mailto:PShaffner@STRADLEY.COM)>; Sparrow, Amy <[ASparrow@STRADLEY.COM](mailto:ASparrow@STRADLEY.COM)>

**Cc:** Doty, David <[ddoty@stradley.com](mailto:ddoty@stradley.com)>; Jeff Silvestri <[jsilvestri@Mcdonaldcarano.com](mailto:jsilvestri@Mcdonaldcarano.com)>; Sarai L. Thornton <[SThornton@SkaneMills.com](mailto:SThornton@SkaneMills.com)>; Patrice Stephenson-Johnson <[pjohnson@skanemills.com](mailto:pjohnson@skanemills.com)>; Aimee Creed <[acreed@dacambal.com](mailto:acreed@dacambal.com)>

**Subject:** RE: Collins - LFA Motion to Dismiss

Thanks Paula – I appreciate that.

**Aimee L. Creed, Esq.**

d'Arcambal, Ousley & Cuyler Burk LLP

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Fax: 212-971-3176

**From:** Shaffner, Paula <[PShaffner@STRADLEY.COM](mailto:PShaffner@STRADLEY.COM)>

**Sent:** Wednesday, January 5, 2022 12:44 AM

**To:** Aimee Creed <[acreed@dacambal.com](mailto:acreed@dacambal.com)>; Sparrow, Amy <[ASparrow@STRADLEY.COM](mailto:ASparrow@STRADLEY.COM)>

**Cc:** Doty, David <[ddoty@stradley.com](mailto:ddoty@stradley.com)>; Jeff Silvestri <[jsilvestri@Mcdonaldcarano.com](mailto:jsilvestri@Mcdonaldcarano.com)>; Sarai L. Thornton <[SThornton@SkaneMills.com](mailto:SThornton@SkaneMills.com)>; Patrice Stephenson-Johnson <[pjohnson@skanemills.com](mailto:pjohnson@skanemills.com)>

**Subject:** RE: Collins - LFA Motion to Dismiss

Hey Aimee. Happy New Year to you as well. Covid seems to have derailed everything these days. No problem on an additional two week extension. Feel better.

[bio](#) | [vcard](#) | [email](#) | [map](#) | [website](#)

**Paula Shaffner**

Stradley Ronon Stevens & Young, LLP

p: 215.564.8761 | c: 267.408.6677

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2005 Market Street, Suite 2600  
Philadelphia, PA 19103-7018

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**From:** Aimee Creed <[acreed@darcomb.com](mailto:acreed@darcomb.com)>  
**Sent:** Tuesday, January 4, 2022 12:32 PM  
**To:** Sparrow, Amy <[ASparrow@STRADLEY.COM](mailto:ASparrow@STRADLEY.COM)>  
**Cc:** Shaffner, Paula <[PShaffner@STRADLEY.COM](mailto:PShaffner@STRADLEY.COM)>; Doty, David <[ddoty@stradley.com](mailto:ddoty@stradley.com)>; Jeff Silvestri <[jsilvestri@Mcdonaldcarano.com](mailto:jsilvestri@Mcdonaldcarano.com)>; Sarai L. Thornton <[SThornton@SkaneMills.com](mailto:SThornton@SkaneMills.com)>; Patrice Stephenson-Johnson <[pjohnson@skanemills.com](mailto:pjohnson@skanemills.com)>; Aimee Creed <[acreed@darcomb.com](mailto:acreed@darcomb.com)>  
**Subject:** RE: Collins - LFA Motion to Dismiss

Hi Jeff and Amy –

Happy New Year – I hope 2022 has been good for you all so far. I just wanted to touch base on our MTD response. You had previously agreed to an extension through January 14 and we submitted that consent motion to the Court. This deadline may still be ok but I wanted to ask whether you would be receptive to another 2-week extension in the event we need it. Unfortunately, I came down with Covid over the holidays and have been kind of knocked down with it. Separately, several colleagues and clients also tested positive so getting certain things done or the necessary people involved has been difficult. It's been pretty challenging in NYC overall these past few weeks.

Thanks,  
Aimee

**Aimee L. Creed, Esq.**  
d'Arcambal, Ousley & Cuyler Burk LLP  
Direct dial: (212) 971-3175, ext. 104  
Office: (212) 971-3175  
Fax: 212-971-3176

**From:** Aimee Creed <[acreed@darcomb.com](mailto:acreed@darcomb.com)>  
**Sent:** Monday, December 13, 2021 10:23 AM  
**To:** Sparrow, Amy <[ASparrow@STRADLEY.COM](mailto:ASparrow@STRADLEY.COM)>  
**Cc:** Shaffner, Paula <[PShaffner@STRADLEY.COM](mailto:PShaffner@STRADLEY.COM)>; Doty, David <[ddoty@stradley.com](mailto:ddoty@stradley.com)>; Jeff Silvestri <[jsilvestri@Mcdonaldcarano.com](mailto:jsilvestri@Mcdonaldcarano.com)>; Sarai L. Thornton <[SThornton@SkaneMills.com](mailto:SThornton@SkaneMills.com)>; Patrice Stephenson-Johnson <[pjohnson@skanemills.com](mailto:pjohnson@skanemills.com)>; Aimee Creed <[acreed@darcomb.com](mailto:acreed@darcomb.com)>  
**Subject:** RE: Collins - LFA Motion to Dismiss

Hi Amy –

Please see attached. Subject to final formatting by our Nevada counsel, please let me know whether we may sign on behalf of counsel of record for LFA.

Thanks,  
Aimee

**Aimee L. Creed, Esq.**  
d'Arcambal, Ousley & Cuyler Burk LLP  
Direct dial: (212) 971-3175, ext. 104  
Office: (212) 971-3175  
Fax: 212-971-3176

**From:** Sparrow, Amy <ASparrow@STRADLEY.COM>  
**Sent:** Friday, December 10, 2021 7:58 AM  
**To:** Aimee Creed <acreed@darcomb.com>  
**Cc:** Shaffner, Paula <PShaffner@STRADLEY.COM>; Doty, David <ddoty@stradley.com>; Jeff Silvestri <jsilvestri@Mcdonaldcarano.com>; Sarai L. Thornton <SThornton@SkaneMills.com>; Patrice Stephenson-Johnson <pjohnson@skanemills.com>  
**Subject:** RE: Collins - LFA Motion to Dismiss

Hi Aimee,

LFA will consent to the one-month extension. Please circulate a draft stipulation for the extension.

Best,  
Amy

[bio](#) | [vcard](#) | [email](#) | [map](#) | [website](#)

**Amy E. Sparrow**  
Stradley Ronon Stevens & Young, LLP  
p: 484-323-1353 | c: 610.533.6512  
f: 610.640.1965

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Malvern, PA 19355-1481

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**From:** Aimee Creed <acreed@darcomb.com>  
**Sent:** Thursday, December 9, 2021 9:33 AM  
**To:** Sparrow, Amy <ASparrow@STRADLEY.COM>  
**Cc:** Shaffner, Paula <PShaffner@STRADLEY.COM>; Doty, David <ddoty@stradley.com>; Jeff Silvestri <jsilvestri@Mcdonaldcarano.com>; Sarai L. Thornton <SThornton@SkaneMills.com>; Patrice Stephenson-Johnson <pjohnson@skanemills.com>; Aimee Creed <acreed@darcomb.com>  
**Subject:** Collins - LFA Motion to Dismiss

**External Email - Think Before You Click**

Hi Amy –

We will need to seek a month's extension on our response to LFA's motion to dismiss, getting us past the holidays. I have our response as presently due December 14. Please let me know if you'd consent to an extension through January 14.

Thanks,  
Aimee

**Aimee L. Creed, Esq.**

**d'Arcambal, Ousley & Cuyler Burk LLP**  
**40 Fulton Street • Suite 1501**  
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